

REMARKS & RESPONSE TO OFFICE ACTION

This Paper is submitted in complete response to the Office Action mailed January 23, 2002 (hereinafter, the "Office Action"). Claims 1-25 remain pending in the Application and are presented for reconsideration. Entry of this Paper along with allowance of all pending claims (claims 1-25) are earnestly requested as is the grant of a U.S. Patent.

Additionally, submitted contemporaneously herewith is a Petition for a Three-Month Extension of Time along with appropriate fees to extend the period for response to the Office Action until July 23, 2002. A grant of the Petition for Extension of Time is hereby respectfully requested.

It is believed that no additional fees are due or owing in regard to the submission of this Response and Amendment and its attached and related papers. However, if such fees are deemed due, the Office is invited to contact the undersigned at the address and telephone number listed below.

The remarks that follow are submitted in complete response to the points raised in the Office Action that require such action.

The Rejection of Claims 1-25 Under 35 U.S.C. § 103(a)

Spanning pages 1 to 5 of the Office Action, the Examiner rejects claims 1-25 under 35 USC § 103(a), as allegedly being unpatentable over U.S. Patents No. 5,913,215 to Rubinstein et al. in view of U.S. Patent No. 6,061,738 to Osaku et al. The Examiner avers that Rubinstein in view of Osaku teaches the claimed invention.

The Examiner asserts that Rubinstein discloses substantially the same features of the invention as claimed in claims 1-25. The Examiner further asserts that Rubinstein teaches a method of using a network content search engine, comprising the steps of: loading a software

package facilitating construction of a navigation sentence out of pre-configured sentence parts, said pre-configured sentence parts including at least one network navigation destination instruction; and accessing a second network location based on said at least one network navigation destination instruction. The Examiner admits that Rubinstein fails to disclose where a first network location is accessed to receive the software package, serving the software to the client processing system to run thereby. The Examiner attempts to make up for the missing elements and deficiencies of Rubinstein by referring to Osaku. The Examiner asserts that Osaku teaches a communication data/access retrieval system/method for accessing information via URL's, discloses means for accessing a first network location to receive/download a software package, servicing said software to a client processing system to be run thereby, and additionally discloses a method of using a network content search engine associated with a database module that includes a second network location via a network navigation destination instruction (URL), initiated within a client-side system running in accordance with a WWW browser software application. The Examiner further asserts that it would have been obvious to one having ordinary skill in the art at the time of the invention to modify the system in Rubinstein with a means for accessing a first network location to receive the software package via WWW client-browser application as taught by Osaku to derive the present invention as defined by claims 11 and 16. The Examiner asserts that one would be motivated to make such a modification because it would add functionality to an existing client-browser software application's location address field by storing/updating said navigational destination instruction obtained by the software program locally, thereby increasing system time-response and making better utilization of bandwidth resources, both performance and cost-efficient desirable means.

The Applicant respectfully TRAVERSES the Examiner's rejection and asserts the following remarks:

Please note that while certain text found below is repeated from earlier responses to prior office actions, additional, important text has been included requiring review by the Examiner.

Rubinstein and Osaku, either separately or together, fail to show, teach, or otherwise suggest each and every element of the present invention as defined by claims 1-25. As already described above, the claims of the instant Application have been amended to include language that better defines "a search sentence" and the use thereof in the present invention. In great contrast to the use of pre-configured KEYWORD/phrases as apparently taught in Rubinstein, a search sentence is an English-like sentence that is used to correspond to a network addressable resource and used to navigate directly (*e.g., without the need for subsequent, conventional search engine operations*) to a particular network location. The search sentence is constructed from pre-stored, pre-configured sentence parts stored within a database or other software package (that may be downloaded to a network client or browser, for example) including at least a verb, an object (i.e., the specification discusses a subject (see specification page 12, lines 12-23), but in the English language, the subject as defined in the specification corresponds to an object part of a sentence, and therefore, object and subject are interchangeable for the purposes of describing the present invention), and a destination. See e.g., claim 11, lines 4-5. Accordingly, a search sentence could be "Buy CDs at amazon.com." where "Buy" is the verb, "CDs" is the object/subject and "amazon.com" is the destination (here, a home page is used as an exemplary destination, however, the present invention is not so limited; for example, a

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company name, domain name, etc. may be used ("AMAZON" instead of a URL such as "www.amazon.com"), etc.). The present invention then or contemporaneously selects a network navigation destination instruction based upon the search sentence selected from pre-stored, pre-configured sentence parts that are included within a served database or other software object.

See e.g., amended claims 1 and 11. THE SENTENCE PARTS OF THE PRESENT INVENTION MAY BE PRESENTED IN THE FORM OF LISTS (E.G., DROP-DOWN LISTS, ETC.) THAT ARE STORED WITHIN A SERVED SOFTWARE OBJECT (E.G., A DATABASE, ETC.); SUCH SENTENCE PARTS ARE THEN SELECTED BY A USER TO FORM A SEARCH SENTENCE THAT DIRECTLY CORRESPONDS TO A NETWORK LOCATION SUCH A NETWORK DOCUMENT (E.G., A HOMEPAGE html document).. For example, a user may complete the sentence "I WANT TO..." by first selecting a verb "BUY," then selecting an object "CDs" or "A CAR", then selecting a destination such as "AMAZON" or "FORD.COM," respectively, to form the complete sentence "I WANT TO BUY CDs at AMAZON." The sentence parts "CDs," "CAR," "AMAZON," and "FORD" in this example, are pre-stored within a served data object (e.g., a software object or part of a software package, a database, etc.) that is served to a user's browser for appropriate user selection such as from an online form object (e.g., a drop-down box, etc.), for example – see claim 1. The user does not self-specify or enter his/her own personnel terms into an open-ended search expression as is the case with conventional search engine technology and services (as exemplified by Rubinstein, etc.), but INSTEAD, selects from pre-stored, pre-configured sentence part terms. In the present invention, sentence parts (e.g., BUY CDs at AMAZON) may be assigned to particular destination such as AMAZON.COM in the context of an advertising arrangement or the like. (In the present example, a network navigation destination instruction could be a particular URL

within the amazon.com website (e.g., www.amazon.com/cds/doc.html, etc.). An exemplary illustration of pre-stored sentence parts is shown in the attached EXHIBIT A – a screen shot of a website known as SIMPLE.COM which includes an implementation of the instant invention (known as the SITE ENGINE™ -- shown in the left hand corner of the screen near the sentence stem “I WANT TO...;” The Examiner is invited to visit simple.com (www.simple.com) to engage in an online, hands-on demonstration of the present invention.

In great contrast to the present invention, Rubinstein teaches the use of KEYWORDS and phrases, which are completely different from a search sentence as defined by the present invention. See Rubinstein at column 2, lines 28-67. Rubinstein teaches pre-analyzing network files (web sites, etc.) via linguistic analysis to extract KEYWORDS (e.g., those which are embedded in a html document header, etc.) from them and then allows the user to select from the extracted KEYWORDS in order to do a more limited network search (i.e., another network search using KEYWORDS). See Id. In fact, Rubinstein states that its methods operate by prompting a computer-user to enter a search string comprised of keywords. See Rubinstein at ABSTRACT. The search string according to Rubinstein is communicated to a plurality of search engines located at respective World Wide Web sites. Id. Each of the plurality of search engines is prompted to concurrently identify a respective plurality of web pages containing text consistent with the user's search string and to return to the user a respective URL for each such web page identified. Id. Furthermore, each web page is *linguistically analyzed* to automatically identify for the user keyword phrases therein, etc. Id. The search engines that Rubinstein contemplates are Yahoo! or LYCOS.COM like in nature those that accept only unformatted, free-formed keyword specifications from users. Such search engine functionality only allows a user to repetitively dig-down deeper and deeper at successive levels of search to possibly arrive

at content that matches a user's search criteria, which possibly does not match his actual desired intention (to quickly and directly navigate to a particular network location based on some desired activity). Rubinstein teaches nothing of selecting [pre-stored sentence parts] that may be served within a data object such as a database sent from a server, etc. as is defined by claims 1-25. In contrast to all cited prior art, the present invention as defined by claims 1-25 allows a user to go immediately and directly to a network location (e.g., homepage, etc.) that directly matches his desired intention (e.g., "...to Buy Books at AMAZON.COM.").

To clarify the points raised in the immediately preceding paragraph, quotation from Rubinstein is appropriate. Rubinstein states, in pertinent part:

At step 110, each of the plurality of documents is linguistically analyzed to identify keyword phrases therein, and the identified keyword phrases are presented to the user. A keyword phrase is a combination of two or more words expressing a significant concept, and a document is said to contain a keyword phrase if the keyword phrase literally appears in the document or its basis for derivation appears in the document. For example, a document containing the phrase "clothing that is machine washable" contains the keyword phrase "machine washable clothing" because, even though "machine washable clothing" does not appear literally in the document, the basis for deriving the keyword phrase does. Linguistic analysis and identification of keyword phrases is discussed further below. At step 120, the user is prompted to construct a query expression by selecting keyword phrases from the presented set of keyword phrases. A query expression is a logical expression in which one or more keyword phrases appear as operands. At step 130, one or more of the plurality of documents is identified based on the constructed query expression. For example, if the plurality of documents consists of the set (A, B, C, D, E) and the query expression is: keyword phrase 1 AND keyword phrase 2 AND NOT keyword phrase 3, then the document from the set (A, B, C, D, E) satisfying or most nearly satisfying the query expression (i.e., containing keyword phrase 1 and keyword phrase 2, but not containing keyword phrase 3), will be identified by step 130. At step 140, an abstract of the document is generated, and at step 150 the document abstract is presented to the user. As will be discussed further below, the document abstract is obtained by linguistic analysis of the identified document to identify key concepts therein.

Rubinstein at col. __, line __ in regard to FIG. 1 (a method for identifying one of a plurality of documents stored in a computer-readable medium) (emphasis added).

In addition to the foregoing points, in the present invention, no network search engine search is performed. Instead, the network navigation destination instruction is selected and executed (e.g., traversed automatically by a web browser, etc.), thus navigating directly to the destination network site. See e.g., claim 11, lines 7-8, specification page 18, lines 5-22.

Furthermore, [a search sentence does not utilize KEYWORDS as Rubinstein requires] In fact, if a search sentence were used to perform a network search like KEYWORDS, the search results would be undoubtedly inaccurate. Unlike KEYWORDS, a search sentence, as defined by the present invention, provides a new and useful way to directly navigate to one or more network addresses in direct response to what a user actually wants to accomplish (e.g., buy compact discs from Amazon.com, etc.).

The Examiner attempts to make up for the missing elements in Rubinstein by referring to Osaku. Osaku fails to make up for the missing elements in Rubinstein. Osaku teaches systems and methods for navigating the Internet and World Wide Web. In particular, Osaku teaches an elaborate process for navigating to a web site via a web browser based on a number or character string input into a web browser's address window. Column 4, lines 32-65. The process in Osaku allows a user to put a number in the address window of a browser that the browser uses to determine or map to a URL (uniform resource locator – e.g., the “http://www.desiredsitestring.bbb” string entered into a browser's address field). The browser may contact a web site to determine the URL based on the number already input into the browser window and can navigate to a particular URL if found. **Nowhere does Osaku show, teach or otherwise suggest that a first network address is accessed to receive a software package that facilitates the building of a search sentence from pre-stored, pre-configured sentence parts which directly correspond to navigation instructions like or similar to a network URL, etc. as defined by the present invention. In great contrast to the present invention, Osaku requires that the initial string be placed in the web browser address window and to access a network addresses to perform some type of network search to determine the URL (e.g., a web site is accessed in order to access a database to receive the URL). See Id.**

Furthermore, Osaku does not show, teach or otherwise suggest any type of search sentence construction, as defined by the present invention, as defined by claims 1-25.

Thus, it would not have been obvious to one having ordinary skill in the art at the time the invention was made to combine the teachings of Rubinstein with Osaku to derive the present invention as defined by claims 1-25. At best, the combinations of the prior art would produce a web browser that can access a web site to facilitate access to a database to perform some sort of additional KEYWORD network search.

The references relied on and cited by the Examiner cannot be said to show, teach, or otherwise suggest the present invention as defined by claims 1-25. In particular, neither Rubinstein nor Osaku, either alone or in combination, show, teach, or otherwise suggest a system for building and executing a network navigation instruction via corresponding sentence construction that includes a server data processing system having at least one database storing pre-configured navigation options and corresponding pre-configured navigation destination instructions, and a client data processing system coupled to the server data processing system via an electronic data network and configured with at least one program, wherein the least one program causes the client data processing system to access the server data processing system to load the pre-configured navigation options and the corresponding pre-configured navigation destination instructions into a local data storage facility, to facilitate construction of a navigation sentence via user selection of pre-configured sentence parts **included within said pre-configured navigation option...** as defined by amended claim 1, for example, and as claimed in claim 11 (...constructing said navigation sentence from said pre-configured sentence parts included within said software package...), as claimed 17 (...a destination included within

said database module...), etc. **The inclusion of sentence parts that are served from a server, for example, and which are user-selected is a feature of the claimed invention that is neither shown, taught, nor otherwise suggested by the references relied upon by the Examiner.** The features of the dependent claims are now included herein by reference; lengthy verbose comments about such dependent claims have been omitted here for purposes of brevity.

Accordingly, in view of the aforementioned comments, it is respectfully asserted that claims 1-25, are distinguishable and clearly patentable over Rubinstein in view of Osaku under 35 U.S.C. § 103(a). Thus, for the foregoing reasons, it is earnestly requested that the Examiner's rejection be withdrawn and that claims 1-25, be allowed to issue in a U.S. Patent.

CONCLUSIONS:

This Paper has been submitted in complete response to the Office Action mailed January 23, 2002 (hereinafter, the "Office Action"). Claims 1-25 remain pending in the Application and have been presented for reconsideration. Entry of this Paper along with allowance of all pending claims (claims 1-25) are earnestly requested as is the grant of a U.S. Patent.

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It is believed that no additional fees are due or owing in regard to the submission of this Response and Amendment and its attached and related papers. However, if such fees are

deemed due, the Office is invited to contact the undersigned at the address and telephone number listed below.

If it is believed that a telephonic or in-person Examiner interview will in any expedite the handling of this Response and Amendment to further examination on the merits of the instant patent application, the Examiner is invited to contact the undersigned at the telephone numbers and address listed below.

Respectfully submitted,

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